



Fox Rothschild LLP

ATTORNEYS AT LAW

Mail: P. O. Box 5231, Princeton, NJ 08543-5231

Princeton Pike Corporate Center  
997 Lenox Drive  
Lawrenceville, NJ 08648-2311  
Tel (609) 896-3600 Fax (609) 896-1469  
[www.foxrothschild.com](http://www.foxrothschild.com)

Karen A. Confoy  
Direct Dial: (609) 844-3033  
Email Address: [kconfoy@foxrothschild.com](mailto:kconfoy@foxrothschild.com)

# ORDER

May 27, 2022

**VIA ECF**

Honorable Edward S. Kiel, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: Pearson Education, Inc. v. Chegg, Inc.**  
**Civil Action No. 2:21-cv-16866-SDW-ESK**

Dear Judge Kiel:

Further to the direction provided by Your Honor during the April 25, 2022 telephone conference, I write on behalf of both parties to request that the Court extend the date to bring before the Court “[a]ll disputes relating to written discovery requests,” which is currently set for May 31, 2022. ECF. No. 38, ¶ 8. We respectfully request that the period be extended through September 30, 2022.<sup>1</sup> If Your Honor approves the proposed new deadline, we respectfully request that the new date be “So Ordered” below and entered on the docket.

Thank you for Your Honor’s kind attention to this matter.

Respectfully submitted,

*s/ Karen A. Confoy*

Karen A. Confoy

---

<sup>1</sup> We also request that this deadline not apply to disputes relating to contention interrogatories. Local Civil Rule 33.1(d) provides “[c]ontention interrogatories shall not be served until 60 days prior to the close of fact discovery unless otherwise permitted by the Court.” The parties currently disagree regarding the need to depart from the Local Rules and provide for a longer period of time, and will defer to Your Honor regarding when the issue will be timely for consideration.



Hon. Edward S. Kiel, U.S.M.J.  
May 27, 2022  
Page 2

Cc: Counsel of Record (*via* ECF)

SO ORDERED this **3rd** day of **June**, 2022

*/s/ Edward S. Kiel*

---

Hon. Edward S. Kiel, U.S.M.J.